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Thomas P. Riley, SBN 194706 LAW OFFICES OF THOMAS P. RILEY, P.C. First Library Square 1114 Fremont Avenue South Pasadena, CA 91030-3227

Tel: 626-799-9797 Fax: 626-799-9795 TPRLAW@att.net

Attorneys for Plaintiff J & J Sports Productions, Inc.

UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA OAKLAND DIVISION

J & J SPORTS PRODUCTIONS, INC., CASE NO. 4:14-cv-03951-YGR

Plaintiff,

v.

PATRICIA PAULA ROSEL RAMIREZ,

Defendant.

PLAINTIFF'S EX PARTE
APPLICATION FOR AN ORDER
CONTINUING THE CASE

MANAGEMENT CONFERENCE; AND ORDER (Proposed)

Condont

TO THE HONORABLE YVONNE GONZALEZ ROGERS, THE DEFENDANT AND HER ATTORNEY/S OF RECORD:

Plaintiff J & J Sports Productions, Inc., hereby applies *ex parte* for an order continuing the Case Management Conference presently set for Monday, December 15, 2014 at 2:00 PM. As set forth below Plaintiff respectfully requests that the Court continue the Case Management Conference to a new date approximately Thirty (30) to Forty-Five (45) days forward.

The request for the brief continuance is necessitated by the fact that Plaintiff has not yet perfected service of the initiating suit papers upon the Defendant Patricia Paula Rosel Ramirez, individually and d/b/a Patty's Beauty Salon. As a result, Plaintiff's counsel has not conferred with the defendant concerning the claims, discovery, settlement, ADR or any of the other pertinent issues involving the case itself or the preparation of a Joint Case Management Conference Statement.

Plaintiff recently identified an alternative address that it believes will be successful to serve its initiating suit papers, upon the Defendant.

1	WHEREFORE, Plaintiff respectful	lly requests that this Honorable Court continue the Case
2	Management Conference, presently schedul	ed for Monday, December 15, 2014 at 2:00 PM.
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5		Respectfully submitted,
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9	Dated: December 4, 2014	/s/ Thomas P. Riley LAW OFFICES OF THOMAS P. RILEY, P.C.
10		By: Thomas P. Riley Attorneys for Plaintiff
11		J & J Sports Productions, Inc.
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1	ORDER (Proposed)
3 4	It is hereby ordered that the Case Management Conference in civil action number 4:14-cv-03951 YGR styled <i>J & J Sports Productions, Inc. v. Ramirez,</i> is hereby continued from 2:00 PM, Monday,
5 6 7 8	December 15, 2014 to 2 p.m. on February 2, 2015 . Plaintiff shall serve a copy of this Order on the Defendant and thereafter file a Certification of Service of this Order with the Clerk of the Court.
9 10 11	IT IS SO ORDERED:
12 13 14 15	THE HONORABLE YVONNE GONZALEZ ROGERS United States District Court Northern District of Collifornia
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